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9 *Attorneys for Defendant*
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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 LESLIE ANN TREJO, GUADALUPE
14 RODRIGUEZ, and MANUEL RODRIGUEZ,
15 individuals,

16 Plaintiffs,

17 vs.

18 AMERICAN FAMILY INSURANCE
19 COMPANY, a Foreign Corporation; DOE
20 EMPLOYEES I-V and ROE COMPANIES I-V,

21 Defendants.

CASE NO.: 2:20-cv-02039-APG-EJY

22 **STIPULATION AND ORDER TO**
23 **EXTEND DISCOVERY**
24 **(First Request)**

25 The parties, by and through their counsel of record, submit their first Stipulation to
26 Extend Discovery pursuant to LR 26-3 and LR IA 6-1:

27 1. Discovery that has been completed:

28 a. Plaintiffs served their initial disclosures pursuant to FedRCivP 26(a)(1)
on January 7, 2021

b. Defendant served its initial disclosures pursuant to FedRCivP 26(a)(1)
on January 22, 2021.

c. Defendants propounded Interrogatories and Requests for Production to Plaintiffs, Leslie Ann Trejo, Guadalupe Rodriguez, and Manuel Rodriguez on December 8, 2020. Plaintiffs responded to the Interrogatories and Requests for Production on January 11, 2021.

d. Plaintiffs propounded Interrogatories, Requests for Admission and Requests for Production to Defendant on February 22, 2021.

3. Discovery remaining to be completed:

a. The retention and disclosure of the parties' initial experts and rebuttal experts.

b. The depositions of the parties, relevant witnesses and experts.

c. The anticipated propounding of additional written discovery.

4. Description of why remaining discovery has not been completed within the time limits previously set by the Court:

Defendant has yet to receive medical authorizations from the Plaintiffs. This has inhibited their ability to gather necessary records which will then be provided to their medical expert who will offer opinions based on their review of the records. The parties are addressing this issue and expect a resolution shortly without the need for motion practice. However, Defendant now requires additional time in order to be able to properly defend against Plaintiffs' claims. The parties believe that a sixty (60) extension of the discovery deadlines will be sufficient.

5. ~~Proposed~~ schedule for completing all remaining discovery:

Based on the foregoing, the parties respectfully request that the Court grant their joint request to extend the discovery deadlines in accordance with the schedule below:

	Current	Proposed Dates
Discovery Cut-Off Date	06/18/21	08/17/21
Amend Pleadings or Add Parties	03/19/21	05/18/21
Expert Witness Disclosure	04/19/21	06/18/21
Rebuttal Expert Disclosures	05/19/21	07/19/21
Dispositive Motions	07/19/21	09/17/21

Joint Pretrial Order	08/19/21	10/18/21
Stipulation or Motion to Extend Discovery	04/29/21	06/28/21

IT IS SO STIPULATED.DATED this 17th day of March, 2021.

VAN LAW FIRM

/s/ Joseph Ortuno

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*Attorneys for Plaintiffs Leslie Ann Trejo,
 Guadalupe Chaves Diaz and
 Manuel Rodriguez*

DATED this 17th day of March, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Scott A. Flinders

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 American Family Insurance Company*

ORDER

IT IS SO ORDERED.


 ELAYNA J. YOUCHAH
 UNITED STATES DISTRICT COURT JUDGE

DATED this 17th day of March, 2021.

Submitted by:

HUTCHISON & STEFFEN, PLLC

/s/ Scott A. Flinders

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